

1 Michael F. Ram, SBN #104805
2 Email: mram@rocklawcal.com
3 Susan S. Brown, SBN #287986
4 Email: sbrown@rocklawcal.com
5 RAM, OLSON, CEREGHINO & KOPCZYNSKI
6 555 Montgomery Street, Suite 820
7 San Francisco, California 94111
8 Telephone: (415) 433-4949
9 Facsimile: (415) 433-7311

10 [Additional Counsel Appear on Signature Page]

11 *Attorneys for Plaintiffs*

12 U.S. DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 NATHAN BURGOON and CALEB LANDERS,
16 on behalf of themselves and all others similarly
17 situated,

18 Plaintiffs,

19 vs.

20 NARCONON OF NORTHERN CALIFORNIA
21 d/b/a NARCONON REDWOOD CLIFFS,
22 HALCYON HORIZONS, a California
23 Corporation; NARCONON FRESH START
24 d/b/a WARNER SPRINGS, a California
25 Corporation; ASSOCIATION FOR BETTER
26 LIVING AND EDUCATION
27 INTERNATIONAL, a California Corporation;
NARCONON WESTERN UNITED STATES, a
California Corporation; NARCONON
INTERNATIONAL, a California Corporation;
and DOES 1-100, ROE Corporations I – X,
inclusive,

Defendants.

NO. 3:15-cv-01381-EMC

**STIPULATION AND [PROPOSED]
ORDER ALTERING BRIEFING
SCHEDULE FOR MOTIONS TO
COMPEL ARBITRATION OR
DISMISS COMPLAINT**

Hon. Edward M. Chen

JURY TRIAL DEMAND

Complaint Filed: March 25, 2015

DATE: July 2, 2015

TIME: 1:30 p.m.

LOCATION: Courtroom 5, 17th Floor

I. RECITALS

Defendants Association for Better Living and Education International, Narconon Western United States, Narconon International, and Narconon Fresh Start filed a motion to compel arbitration or in the alternative to dismiss the complaint on May 22, 2015. Dkt. No. 27. Defendant Halcyon Horizon, Inc. dba Narconon Northern California and dba Narconon Redwood Cliffs (collectively “Defendants”), also filed a similar motion on that same date. Dkt. No. 25.

Plaintiffs requested, and Defendants agreed, to extend the briefing schedule for Plaintiffs’ opposition to these motions by one week – from June 5, 2015 to June 12, 2015. Likewise, Defendants requested, and Plaintiffs agreed, to extend the briefing schedule for Defendants’ reply brief by an additional week – from June 12 to June 26, 2015. Under this stipulation the hearing date would not change but would remain July 2, 2015 at 1:30 p.m.

II. STIPULATION

Therefore, the parties stipulate to the following briefing schedule for Defendants’ motions:

Plaintiffs’ Oppositions Due: June 12, 2015

Defendants’ Replies Due: June 26, 2015

Hearing Date: ~~July 2~~, 2015, at 1:30 p.m.

July 23

1 STIPULATED, DATED AND RESPECTFULLY SUBMITTED this 4th day of June,
2 2015.

3 TERRELL MARSHALL DAUDT
4 & WILLIE PLLC

SCHEPER KIM & HARRIS LLP

5 By: /s/ Mary B. Reiten, SBN #203142
6 Beth E. Terrell, SBN #178181
7 Email: bterrell@tmdwlaw.com
8 Mary B. Reiten, SBN #203142
9 Email: mreiten@tmdwlaw.com
10 936 North 34th Street, Suite 300
11 Seattle, Washington 98103-8869
12 Telephone: (206) 816-6603
13 Facsimile: (206) 350-3528

14 Michael F. Ram, SBN #104805
15 Email: mram@rocklawcal.co
16 Susan S. Brown, SBN #287986
17 Email: sbrown@rocklawcal.com
18 RAM, OLSON, CEREGHINO
19 & KOPCZYNSKI
20 555 Montgomery Street, Suite 820
21 San Francisco, California 94111
22 Telephone: (415) 433-4949
23 Facsimile: (415) 433-7311

24 David E. Miller, SBN #294095
25 Email: david@slawfirm.com
26 Syed Ali Saeed, *Admitted Pro Hac Vice*
27 Email: ali@slawfirm.com
SAEED & LITTLE LLP
1433 North Meridian Street, Suite 202
Indianapolis, Indiana 46202
Telephone: (317) 721-9214
Facsimile: (888) 422-3151

Attorneys for Plaintiffs

By: /s/ William H. Forman, SBN #150477
William H. Forman, SBN #150477
Email: wforman@scheperkim.com
601 West 5th Street, 12th Floor
Los Angeles, California 90071
Telephone: (213) 613-4682
Facsimile: (213) 613-4656

*Attorneys for Defendants Narconon Int'l,
Narconon Fresh Start d/b/a WarnerSprings
and Association for Better Living and
Education*

GRUNSKY, EBAY, FARRAR & HOWELL

By: /s/ Dennis P. Howell, SBN #78806

Dennis P. Howell, SBN #78806

Email: dphowell@grunskylaw.com

Rosemary Rovick

Email: rrovick@grunskylaw.com

240 Westgate Drive

Watsonville, California 95076

Telephone: (831) 722-2444

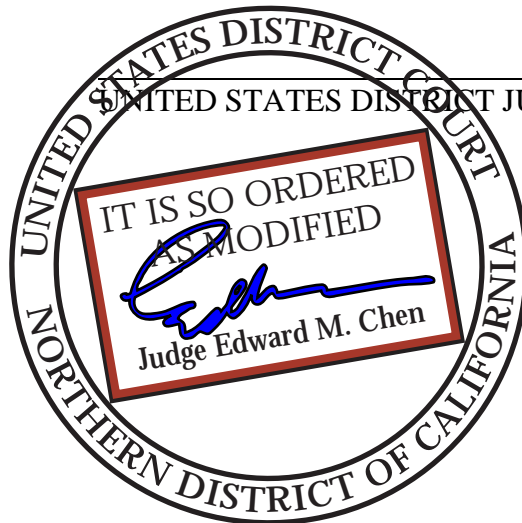
Facsimile: (831) 722-6153

*Attorneys for Defendants Halcyon Horizons,
Inc. dba Narconon of Northern California
and dba Narconon Redwood Cliffs*

III. [~~PROPOSED~~] ORDER

PURSUANT TO STIPULATION IT IS SO ORDERED. (modified above)

Dated this 5th day of June, 2015.



CERTIFICATE OF SERVICE

I, Mary B. Reiten, hereby certify that on June 4, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

William H. Forman, SBN #150477
Email: wforman@scheperkim.com
SCHEPER KIM & HARRIS LLP
601 West 5th Street, 12th Floor
Los Angeles, California 90071
Telephone: (213) 613-4682
Facsimile: (213) 613-4656

Attorneys for Defendants Narconon Int'l, Narconon Fresh Start d/b/a WarnerSprings and Association for Better Living and Education

Dennis P. Howell, SBN #78806
Email: dphowell@grunskylaw.com
Rosemary Rovick
Email: rrovick@grunskylaw.com
GRUNSKY, EBEY, FARRAR & HOWELL
240 Westgate Drive
Watsonville, California 95076
Telephone: (831) 722-2444
Facsimile: (831) 722-6153
Email: dphowell@grunskylaw.com

Attorneys for Defendants Halcyon Horizons, Inc. dba Narconon of Northern California and dba Narconon Redwood Cliffs

DATED this 4th day of June, 2015.

1 TERRELL MARSHALL DAUDT & WILLIE PLLC

2
3 By: /s/ Mary B. Reiten, SBN #203142
4 Mary B. Reiten, SBN #203142
5 Email: mreiten@tmdwlaw.com
6 936 North 34th Street, Suite 300
7 Seattle, Washington 98103-8869
8 Telephone: (206) 816-6603
9 Facsimile: (206) 350-3528

10 *Attorneys for Plaintiffs*